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UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

:

CASE NO. 18-12102-MBK

In re:

:

John W. Miller CERTIFICATION OF COUNSEL

IN SUPPORT OF CONSENT ORDER

DEBTOR :

- 1. I am an attorney, licensed to practice law in the State of New Jersey, am a Member of the law firm of Pluese, Becker & Saltzman, LLC and am responsible for the representation of and authorized to make this Certification on behalf of the Secured Creditor/First Mortgagee, CIT Bank, N.A., c/o LoanCare, (collectively, the "Mortgagee") in the above-captioned matter. I make this Certification of my own personal knowledge and predicated upon matters of record as reflected by documents contained in our firm's file.
- 2. Unfortunately, the Proof of Claim herein was filed after the bar date.
- 3. Debtor, by and through Counsel, has agreed to allow the late filing of the Proof of the Claim and to

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treatment of the Mortgagee's Claim in this reorganization.

4. Accordingly, the Mortgagee on behalf of both Parties, respectfully requests that the annexed proposed

form of Consent Order to entered, memorializing the Parties' agreement for the late filing of the Proof of

Claim.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge,

information, and belief. I am aware that if any of the foregoing statements are wilfully false, I am subject

to punishment.

Respectfully Submitted,

Pluese, Becker & Saltzman, LLC

By: /s/ Rob Saltzman

Rob Saltzman

Attorneys for CIT Bank, N.A., c/o LoanCare, (collectively the "Mortgagee")